

CODE STUDENT ACCOMMODATION PRIVACY POLICY

BACKGROUND:

CODE Student Accommodation understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our student tenants and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

CODE Student Accommodation

CODE Students Ltd registered in England under company number 10148027

Registered address: 40 - 46 Western Road, Leicester, LE3 0GH

VAT number: 108245630

Data Protection Officer:

Email address: DPO@codestudents.co.uk

Telephone number: 0116 2331233

Postal Address: 40 - 46 Western Road, Leicester, LE3 0GH

We are regulated by ANUK National Code of Practice - <http://www.nationalcode.org/>

2. What Does This Policy Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 1 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 1 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way
- i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 1.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Date of birth
- Gender
- Address
- Nationality
- Email address
- Telephone number(s)
- Mobile number
- University name
- University course
- Bank account details
- Allocated room
- Next of kin details
- Medical conditions

If you nominate a guarantor, we will also collect their:

- Name
- Date of birth
- Address
- Nationality
- Email address
- Telephone number(s)
- Mobile number
- Land Registry details for the address given.

Your personal data is obtained from:

- Partial or complete bookings on our website
- Interactions with our online chat, WhatsApp or WeChat functions
- Specially created forms for data capture

And the following third parties:

- Student accommodation agencies
- Student accommodation portals

6. How Do You Use My Personal Data?

Under GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

Your personal data may be used for one of the following purposes:

- Providing and managing your booking and tenancy contract
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you when you have reached out to us. This may include responding to emails, social media, online chat or calls from you.
- Supplying you with information by email post that you have opted-in to (you may unsubscribe or opt-out at any time by informing our Data Protection Officer as detailed above).
- To periodically survey your opinions on the level of service we offer to you.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message, post, WhatsApp or WeChat messages and on social media with information, news, and offers on our products services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the

opportunity to opt-out.

Where we work in partnership with an organisation or agency to make the booking, we may share contract and debt details with this third party and will follow the rules of the UK GDPR and Data Protection Act 2018. We will assess the risks and benefits of sharing, and consider the potential impact on the individual involved.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Your contact details will be kept on file for a minimum period of 2 years to a maximum of 6 years.
- Your assured tenancy contract/guarantor documents will be kept on file for as long as is recommended by tenancy legislation and for a minimum period of 2 years to maximum of 6 years.

8. How and Where Do You Store or Transfer My Personal Data?

Personal details and copies of documents are moved to our secure IT systems, and deleted from our email systems, after processing.

Security controls are reviewed regularly and our systems are subject to ongoing monitoring and updates to ensure they remain protected against the evolving nature of cyber threats. Our IT systems are hosted on secure platforms that align with recognised UK cyber-security best practice, including the Cyber Essentials guidance.

For security reasons, we do not publish detailed information about our protective measures, but we are confident that appropriate technical and organisational safeguards are in place to protect all data entrusted to us.

Where we use a third party systems, we have assessed the security of these systems and are assured they meet our standards of keeping your data safe.

We endeavour to store your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

Mailchimp have servers and offices are located in the United States, so your information may be transferred to, stored, or processed in the United States. While the data protection, privacy, and other laws of the United States might not be as comprehensive as those in the UK, Mailchimp take many steps to protect your privacy, including offering Members a Data Processing Agreement.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to these important exceptions.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority or local authority.

We may sometimes contract with the following third parties to supply products services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

Where sharing your data with third parties is not done under our legitimate interests, we will ask for your permission to share your data. In this instance, only the minimal amount of data required will be shared.

- The National Student Housing Survey
- Housing Hand
- My Deposits Tenancy Protection
- Zopim
- Olympian
- Circuit
- UK Guarantors
- Parcel Tracker
- ASK4
- Service 24
- TEC Electrical
- Winvic
- Mailchimp
- Wufoo
- Textblue
- Sagepay Payment Processing
- Trust Payments
- Clicksend
- Student Crowd
- Land Registry
- META (Facebook/Instagram)
- Google/YouTube
- Twitter
- TikTok

- Snapchat
- Addict Dance Academy
- Agents including UHomes, Awehomes, UniAcco, Amber, Casita
- WhatsApp
- WeChat

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

10. Sharing your data in an emergency

In an emergency, we will go ahead and share data that is necessary and proportionate. Not every urgent situation is an emergency. An emergency includes:

- preventing serious physical harm to a person
- preventing loss of human life
- protection of public health
- safeguarding vulnerable adults or children
- responding to an emergency
- an immediate need to protect national security.

The agencies we will share your data with will be assessed on a case-by-case basis but are likely to include the emergency services, central and local government organisations and university security and welfare teams.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 1.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will initially respond to your subject access request within one week and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. Social Media Platforms

We regard social media platforms as an essential means to communicate with our students and promote events. We also like to share the events to members of social media platforms via images or videos. It is never our intention to post any information that may help identify an individual or post any content that would bring them into any form of distress or offence. By attending an event we therefore deem we have your consent to record and publish that event across our Social Media Channels. You have the opportunity at all events to revoke your consent.

The Social Media platforms we typically use to share information are but not limited to:

- Facebook
- Instagram
- X (Formerly Twitter)
- Snapchat
- TikTok
- WeChat
- Little Red Book, known in Chinese as Xiaohongshu

You do have the right to be forgotten so if in any instance you want any material taken down we will aim to do so in a reasonable timeframe after you have contacted the Data Protection Officer as detailed above.

13. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change business in a way that affects personal data protection.

Any changes will be made available at our postal address above or on our website www.codestudents.co.uk